

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

UNITED STATES OF AMERICA)	
)	
v.)	Case No. 3:19cr130
)	
OKELLO T. CHATRIE,)	
Defendant)	

**DEFENDANT’S SECOND MOTION TO DEFER GOOGLE’S SUBPOENA
COMPLIANCE DEADLINE TO CLOSE OF BUSINESS
ON WEDNESDAY, MARCH 11, 2020**

Okello Chatrie, through counsel, moves the Court to extend Google’s subpoena compliance deadline to close of business on Wednesday, March 11, 2020. In support of this motion, Mr. Chatrie states the following:

1. On February 4, 2020, Mr. Chatrie moved the Court to issue a subpoena *duces tecum* to Google for the production of information necessary to litigate Mr. Chatrie’s pending Motion to Suppress Evidence Obtained from a “Geofence” General Warrant, *see* ECF No. 29. *See* ECF No. 82.
2. On February 7, 2020, the Court granted that motion and issued a subpoena *duces tecum* for Google to produce the requested information. *See* ECF Nos. 85 and 86. Mr. Chatrie had sought and the Court ordered that Google produce the information subject to the subpoena *duces tecum* by Friday, February 21, 2020, at noon. *See* ECF No. 86 at 1. The Court previously extended this deadline for Google to comply with the subpoena to Friday, March 6, 2020. *See* ECF No. 90.
3. Counsel for Mr. Chatrie have continued to be in communication with counsel for Google to discuss the subpoena *duces tecum* in ECF No. 86. Counsel for Google have

requested a short, and final, amount of additional time to produce the information in the form of an affidavit. If such an affidavit sufficiently addresses the information that the subpoena orders Google to produce in part or in whole, the defense can either move the Court to narrow the scope of the subpoena or withdraw it as appropriate.

Thus, Mr. Chatrie moves the Court to extend Google's subpoena compliance deadline to close of business on Wednesday, March 11, 2020.

Respectfully submitted,
OKELLO T. CHATRIE

By: _____/s/_____
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CERTIFICATE OF SERVICE

I hereby certify that on March 6, 2020, I filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all counsel of record.

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